

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

HEATHER KIERNAN,

Plaintiff,

-v-

CIVIL ACTION NO. 04-10131 RBC

ARMORED MOTOR SERVICE OF
AMERICA, INC. and
FRANCESCO CIAMBRIELLO,

Defendants.

**PLAINTIFF HEATHER KIERNAN'S
MOTION FOR LEAVE TO FILE A
SUPPLEMENTAL MEMORANDUM OF LAW IN SUPPORT OF HER
CONSOLIDATED MOTION TO COMPEL THE DEPOSITION OF THE KEEPER
OF THE RECORDS OF THE HARTFORD INSURANCE COMPANY AND
MOTION FOR SANCTIONS FOR FAILURE TO OBEY SUBPOENA**

Pursuant to Local Rule 7.1(B)(3), Plaintiff in the above matter hereby respectfully requests leave to file the attached Supplemental Memorandum of Law in Support of Her Consolidated Motion to Compel the Deposition of the Keeper of the Records of the Hartford Insurance Company and Motion for Sanctions for Failure to Obey Subpoena.

Plaintiff also respectfully requests any other relief that this Court deems equitable, just and proper.

Local Rule 7.1(A)(2) Certification

The undersigned represents that he attempted in good faith to reach the Hartford to discuss compliance with the subpoena, but did not receive any

response.

Respectfully submitted:

THE PLAINTIFF,
Heather Kiernan
By her attorney,

Dated: February 3, 2005

/s/ William J. McLeod
William J. McLeod BBO #560572
McLeod Law Offices, PC
77 Franklin Street
Boston, MA 02110
(617) 542-2956

CERTIFICATE OF SERVICE

I hereby certify that on February 3, 2005, a true and complete copy of this document was served via first class mail upon:

Legal Department
The Hartford Insurance Company
690 Asylum Avenue
Hartford, CT 06115
VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED
7004 2510 0000 9260 8734

AND

Stacy Segan
Legal Department
Division of Insurance for the Commonwealth
One South Station
Boston, MA 02110
Authorized agent for the Hartford Insurance Company

/s/ William J. McLeod
William J. McLeod